

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
KATHERINE A. TANAKA
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Katherine_Tanaka@fd.org
6

7 Attorney for Hector Cirino

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 HECTOR CIRINO,
15 Defendant.
16
17

Case No. 2:03-cr-00176-JCM

**JOINT STIPULATION REGARDING
SUPPLEMENTAL BRIEFING TO
MOTION FOR COMPASSIONATE
RELEASE (ECF NO. 201)**

(Second Reqeust)

18 The parties, Jason M. Frierson, United States Attorney, and Kimberly M. Frayn,
19 Assistant United States Attorney, and Rene L. Valladares, Federal Public Defender, and
20 Katherine A. Tanaka, Assistant Federal Public Defender, counsel for Hector Cirino, file this
21 Joint Stipulation.

22 As a result of the Ninth Circuit's remand and order to reassess Mr. Cirino's motion for
23 compassionate release in light of *United States v. Roper*, 72 F.4th 1097 (9th Cir. 2023) and
24
25
26

1 United *States v. Chen*, 48 F.4th 1092 (9th Cir. 2022), the parties request the opportunity to file
2 supplemental briefing and, therefore, propose the briefing schedule below.¹

3 Defense's supplemental brief shall be due by January 22, 2024. The government shall
4 have 14-days to respond and defense will have 7-days after to reply.

5 DATED this 30th day of November, 2023.

6 RENE L. VALLADARES
7 Federal Public Defender

JASON M. FRIERSON
United States Attorney

8
9 By /s/ Katherine A. Tanaka

By /s/ Kimberly M. Frayn

10 KATHERINE A. TANAKA
Assistant Federal Public Defender

KIMBERLY M. FRAYN
Assistant United States Attorney

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25 ¹ Defense counsel needs additional time to prepare supplemental briefing and, is
26 therefore, requesting the above amended date.

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No. 2:03-cr-00176-JCM

4 Plaintiff,

5 v.

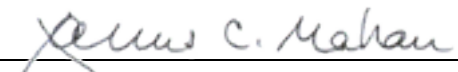
6 HECTOR CIRINO,

7 Defendant.

8
9
10 **ORDER**

11 IT IS THEREFORE ORDERED that Defense's supplemental brief shall be due by
12 January 22, 2024. The government shall have 14-days to respond and defense will have 7-days
13 after to reply.

14 DATED December 7, 2023.

15
16 
17 UNITED STATES DISTRICT JUDGE